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C/O Division of Water Quality
P.O. Box 944213
Sacramento, CA 94244-2130

AB 982 Public Advisory Group

March 27, 2000

State Water Resources Control Board
901 P Street
Sacramento, CA 95814

Dear Board Members:

The AB 982 Public Advisory Group (PAG) has met several times to discuss the State Water Resources Control Board's (SWRCB's) progress in developing its proposal for a comprehensive surface water monitoring program. While our work continues, we believe it may be useful for you to know that the PAG strongly urges incorporation of the following major comments into the current SWRCB draft proposal:

1. The goals of the SWRCB's monitoring program, as described in the January 2000 "Legislative Report" do not address the significant need for ambient water quality monitoring. In our meeting on March 23rd, all PAG representatives unanimously agreed that the state should create an ambient monitoring program that addresses all hydrologic units of the state using consistent monitoring, sampling and analysis methods, standardized data quality assurance protocols, and objective, consistent and centralized data management. Further, the PAG collectively agreed that this program should include *both* potentially clean and polluted areas. The program should be overseen centrally by the State. The Regional Water Quality Control Boards should establish monitoring priorities for the water bodies within their jurisdiction.

2. We also unanimously agreed that the goals of the SWRCB's proposal contained in the "Legislative Report" did not emphasize sufficiently the critical need for standardization and consistency in monitoring sampling and reporting methods in monitoring programs conducted by the RWQCBs. Moreover, we strongly support the concept of ensuring that, to the extent possible, all RWQCBs utilize statewide templates and protocols in developing and implementing other monitoring programs within their regions. Creation of standardization templates and protocols will allow greater use of other high quality monitoring data collected by citizen volunteer groups, academic institutions, private parties, government agencies and others.

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3. Finally, we also unanimously agreed that data management in general needs to be a priority for the state's monitoring programs. Too often, limited funds are spent collecting information that ultimately will be of little use due to lack of standardization of data management methods. We request that one of the major goals of the SWRCB's monitoring program be that this program include the use of existing data to the extent it can be verified and put/linked into centralized locations, and that future data be collected and recorded through a state-developed template and made available to all stakeholders centrally along with accompanying metadata.

Should you wish to discuss this letter, please do not hesitate to call us at (323) 934-6900 (David Beckman) or (916) 498-7722 (Craig Johns).

Sincerely,

David Beckman
Co-Chair

Craig Johns
Co-Chair